Greetings,

The proposed rule making would result in the relocation of public safety users in the 800 MHz band. This represents a significant challenge to those users and the safety of the public they serve and protect. It is unreasonable to place the entire burden of relocation on public safety users.

Public safety users accepted the current frequency plan on the good faith that their systems would be protected from interference. Based on this premise, significant public funding was expended to develop and build these vital systems. Yet harmful interference from adjacent services is a common occurrence.

There is growing evidence that the Michigan Public Safety Communications System is experiencing significant problems due to interference in the Detroit and other metropolitan areas of the state. This places the lives of those responsible for preservation of the public safety in jeopardy. This situation must be corrected as quickly as possible.

The State of Michigan has spent in excess of $250 million dollars constructing a statewide 800 MHz public safety communications system utilizing NPSPAC frequencies. At present there are over 8000 users representing federal, state, and local government and public safety agencies throughout the state of Michigan actively using the system. Additional users are being added daily and the user base will continue to expand as additional federal, state, and local agencies enter the system.

This system involves a considerable investment in equipment and site development dollars, and also represents a significant investment in man-hours of design, testing, and verification of the system's performance.

Public Safety users depend on the operation of this system on a continuous basis, and considerable resources are dedicated to insure that the system does perform consistently. Round-the-clock monitoring of system operation and availability of maintenance personnel and materials represents another significant investment in the system by the people of the State of Michigan.

The Michigan State Police Communications Division is concerned that any proposed relocation of the NPSPAC band public safety users be carefully considered in regard to the following issues.

Any plan to correct the current situation must be implemented in a timely manner. The lives of those involved in law enforcement and other public safety activities should not be placed in a continuing state of jeopardy due to prolonged legislative or regulatory activity. We recognize the necessity to carefully consider the consequences of any changes, however, once a course of action is identified, it must be implemented with all speed.

Any estimate of the cost of relocation of public safety frequencies must include not only the cost of necessary replacement equipment, it must include the cost of planning and implementing a seamless transition to the new frequency arrangement. This must include significant radio coverage

validation in addition to equipment testing. Relocation could also involve the acquisition of additional equipment that would be used to provide continuous service during the transition. The total cost of relocation must be funded, and those responsible for the interference should shoulder the burden of that cost.

Any transition must be a complete solution to the elimination of current and future interference to public safety systems. The FCC must carefully consider all known potential sources of interference along with the implications of developing technologies, and insure that harmful interferen ce to public safety channels is eliminated both now and in the future.

Any relocation should represent an equitable division of the technical challenges involved in such a transition. Public Safety agencies are being told that their mobile and portable equipment must be upgraded. Yet there is little evidence that the stations producing the interference are being upgraded to provide additional suppression of the offending emissions. Providing additional adjacent channel selectivity in mobiles and portables designed for wide frequency excursions is a difficult engineering challenge and will add to the already high cost of each handheld and mobile radio. There must be a corresponding increment in the suppression of out-of-channel emissions by the offending base transmitters.

We sincerely hope that a solution can be realized as expeditiously as possible.